

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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MICHAEL GOLDSTEIN, GOLDSTEIN  
GROUP HOLDINGS, INC., BERNARD  
KAHN, DAVID WEINBERG, and  
RAPHAEL KNEPLER,

ECF Case

Plaintiffs,

11-cv-6227 (VLB)(PED)

-against-

SOLUCORP INDUSTRIES, LTD., EAST  
MORGAN HOLDINGS, INC., LONDON  
VENTURES CAPITAL CORP., MICHAEL  
REIDEL, RICHARD RUNCO, RICHARD  
GREENE, ISRAEL TYBERG, PETER  
MANTIA and JOSEPH KEMPROWSKI,

Defendants.

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**DECLARATION OF ROBERT L. LASH  
IN OPPOSITION TO MOTION OF NON-PARTY J L PROVIDERS, INC.  
FOR LEAVE TO INTERVENE**

Robert L. Lash hereby declares, pursuant to 28 U.S.C. §1746, as follows:

1. I am an associate of the law firm of Herzfeld & Rubin, P.C., attorneys for Plaintiffs and am fully familiar with the facts and circumstances set forth herein.
2. I submit this declaration in opposition to the application by non-party JL Providers, Inc. ("JL") for leave to intervene.
3. Attached as Exhibit A hereto is a true copy of excerpts from the deposition of defendant East Morgan Holdings, Inc. by its Director and CEO, Samuel B. Tress.
4. Attached as Exhibit B hereto is a true copy of excerpts from the deposition of defendant Peter R. Mania.

5. Attached as Exhibit C hereto are true copies of affirmations of Joel Landau, dated March 3 and 18, 2014

6. Attached as Exhibit D hereto is a true copy of a Stock Sale Agreement, dated June 17, 2010.

7. Attached as Exhibit E is a true copy of excerpts from the deposition of plaintiff Michael Goldstein.

8. Attached as Exhibit F is a true copy of a document produced by defendant Michael Reidel in this action.

9. Plaintiffs respectfully request that this court deny JL's motion in its entirety.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 10, 2014 in New York, New York.

s/ Robert L. Lash  
Robert L. Lash  
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